

From: [REDACTED]
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Dear [REDACTED]

ACP-2018-66 – RAF Northolt Airspace Change Proposal - Letter from CAA dated 29 Jul 2019

1. I am writing in response to your letter dated 29 Jul 19 which states that it is necessary for ACP sponsors to adopt an additional design principle as follows:

“Subject to the overriding design principle of maintaining a high standard of safety, the highest priority principle of this airspace change that cannot be discounted is that it accords with the CAA’s published Airspace Modernisation Strategy (CAP 1711) and any current or future plans associated with it.”

RAF Northolt and the MOD recognise the importance of the AMS in relation to our ACP however after safety, RAF Northolt’s highest priority design principle in respect to this airspace change is:

Must ensure continuation of military and governmental operational activity,

as agreed, and approved, at Stage 1. The continuance of defence activity is of paramount importance to the MOD when considering airspace change and this cannot be compromised. We note that the AMS cites an obligation to “facilitate defence and security objectives” as a deliverable.

2. RAF Northolt believe that their current list of DPs as approved at Stage 1 cover all the aspects of the AMS relevant to the RAF Northolt ACP, based on our Statement of Need, and agreed in conjunction with our stakeholders. RAF Northolt have referenced the AMS throughout their engagement with stakeholders to explain the government directed requirement for airspace modernisation which is clearly communicated as our rationale for change, and we intend to continue to highlight the AMS during future engagement activities.

3. When considering inclusion of this additional design principle RAF Northolt deemed it extremely difficult given the wealth and breadth of information contained within the AMS, some of which may not be relevant to this specific ACP. If included, it would also be difficult to measure the extent to which any of our design options would meet a design

principle as broad as this. In relation to the masterplan, as a sponsor, we are unable to consider or refer to a document that does not yet exist.

4. As an observation, you may wish to consider the precedence inclusion of an additional design principle at this stage will set, noting that we have already passed the DEFINE gateway. It is our opinion that mandatory inclusion of an additional design principle potentially undermines the CAP1616 process and could create conflict surrounding the responsibility and role of the regulator in this process. From a sponsor's perspective, we believe it also undermines the work conducted with and trust gained with our stakeholders throughout the process to date.

5. In summary, RAF Northolt do not intend to include an additional design principle specifically around the AMS, we believe this has already been given sufficient visibility and will continue to include the AMS during our ongoing engagement . It is unclear what the addition of this design principle is trying to achieve; further guidance on the rationale for inclusion of this would help aid our understanding of the intent. We would therefore welcome an opportunity to discuss the matter further, if required.

Yours sincerely,

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